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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**JOINDER OF FORT WORTH EMPLOYEES'
RETIREMENT FUND TO SECURITIES
LEAD PLAINTIFF'S OBJECTION TO
REORGANIZED DEBTORS' MOTION TO
APPROVE SECURITIES ADR AND
RELATED PROCEDURES FOR
RESOLVING SUBORDINATED
SECURITIES CLAIMS [D.I. 9189]**

1 Fort Worth Employees' Retirement Fund, the holder of a Securities Claim¹ and a
2 creditor in the chapter 11 bankruptcy cases (the "**Chapter 11 Cases**") of the above-captioned
3 reorganized debtors (the "**Debtors**", or as reorganized pursuant to the Plan, the "**Reorganized**
4 **Debtors**"), by and through its undersigned counsel, submits this joinder ("**Joinder**") to
5 *Securities Lead Plaintiff's Objection to Reorganized Debtors' Motion to Approve Securities*
6 *ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket No. 9189]
7 (the "**Securities ADR Objection**"), in opposition to *Reorganized Debtors' Motion to Approve*
8 *Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket
9 No. 8964] (the "**Securities ADR Motion**"). In support of this Joinder, Fort Worth Employees'
10 Retirement Fund, respectfully states as follows:
11

12 **JOINDER AND RESERVATION OF RIGHTS**
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14 1. Fort Worth Employees' Retirement Fund is a Securities Claimant and timely filed
15 proofs of claim against the Debtors by the Extended Bar Date (Claim Nos. DQN#D27423 and
16 D**J*27423).

17 2. Fort Worth Employees' Retirement Fund incorporates by reference and hereby
18 joins in all arguments set forth in the Securities ADR Objection.

19 3. Fort Worth Employees' Retirement Fund reserves its right to supplement this
20 Joinder and further reserves its rights to participate in any hearing to consider the Securities
21 ADR Motion, including its rights to make any arguments and to examine witnesses.
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26 ¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities
27 ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as
28 applicable.

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CONCLUSION

For all of the foregoing reasons, Fort Worth Employees' Retirement Fund respectfully requests that this Court enter an Order denying the Securities ADR Motion and granting such other and further relief as may be just and proper.

Dated: October 6, 2020

BARRACK, RODOS & BACINE

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